

June 27, 2025

VIA ECF

Hon. Kiyo A. Matsumoto
United States District Court Judge
United States Courthouse
225 Cadman Plaza East
Courtroom 6C South
Brooklyn, NY 11201

Re: *United States v. Villani, et al.*, 22-cr-405 (KAM)

Dear Judge Matsumoto:

We represent defendant Anthony Villani in the above-referenced matter. We write in response to the government's June 17, 2025 submission, and to provide the Court with additional material for consideration in advance of Mr. Villani's July 9, 2025 sentencing hearing.

Specifically, attached as Exhibit 1, is a letter from Mr. Villani's mother's treating physician addressing her medical situation, and Mr. Villani's involvement in his mother's care. He plays a vital role in ensuring his [REDACTED] mother is safe and looked after.

As her physician confirms, Mr. Villani's mother, Phyllis Pezzullo suffered [REDACTED]
[REDACTED]
[REDACTED] Ex. 1. She is
no longer independent. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] et.

Mr. Villani has played an instrumental, and daily role in his mother's care following her [REDACTED]. As Ms. Pezzullo's doctor observes:

Throughout her illness, Mr. Anthony Villani has shown compassion and responsibility for her care. [REDACTED]
[REDACTED]

Mr. Anthony Villani accompanies her on all her visits and coordinates her care.

Mr. Anthony Villani has demonstrated to be a reliable caregiver and is an integral part of her care. He organizes and helps to administer her medications daily. He

has also shown leadership to guide her daily chores, including grocery shopping and meal preparation.

Ex. 1.

Mr. Villani's devotion to his mother's well-being is exceptional, and not easily replaced. The government blithely argues that Mr. Villani's children can simply tend to their grandmother in his stead. But while they would surely want to be there for their grandmother, grandfather, and mother, it is not so easy. *See* Gov. Sentencing Ltr. at 11. Mr. Villani's children both have demanding schedules of their own—his son is a director running a large team at an investment bank, and his daughter serves clients as a mental health counselor. Their budding careers do not offer them the flexibility that Mr. Villani has to care for his mother, or tend to his wife when she faces a health crisis.

Mr. Villani has set up his life to focus on his mother's healthcare. Mr. Villani's mother's doctor puts it best: "[i]t is not often that you find a family member who is so dedicated. Ms. Phyllis Pezzullo's health and prognosis are directly related to Mr. Anthony Villani's care of her condition." *Id.* Mr. Villani's crucial role in ensuring his mother's continued well-being is a powerful basis for imposition of a below-Guidelines sentence.

Respectfully submitted,

/s/ IH

Henry E. Mazurek

Ilana Haramati

Counsel for Defendant Anthony Villani

cc: Counsel of Record (*via ECF*)